

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Fitchburg Gas and Electric Light Company) D.T.E. 01-103
2001 Electric Rate Reconciliation)

MOTION OF FITCHBURG GAS AND ELECTRIC LIGHT COMPANY
FOR LEAVE TO FILE NINE ADDITIONAL INFORMATION REQUESTS
OF THE ATTORNEY GENERAL

Now comes Fitchburg Gas and Electric Light Company ("FG&E") and requests leave from the Department of Telecommunications and Energy ("Department") to file nine (9) additional information requests of the Attorney General after the close of discovery. As good cause for modification of the procedural schedule, FG&E states as follows.

1. In its procedural schedule for D.T.E. 01-103, the Department established a date for the end of discovery of Monday, July 8, or two weeks after the Attorney General's testimony was filed.
2. FG&E filed a set of information requests with 15 inquiries on July 5, which, under the Department's procedural schedule, were due from the Attorney General on July 10.
3. On July 15, the Attorney General filed his responses, objecting in part to multiple responses, and completely objecting to FGE 1-2, FGE 1-9, FGE-1-11 (misabeled FGE 1-15 by the Attorney General).
4. In spite of the multiple objections, the Attorney General's responses were five days overdue.
5. FG&E's questions in its First Set of Information Requests were designed to assist in narrowing the issues between the parties, in particular those questions numbered FGE 1-8 through FGE 1-15.
6. FG&E's proposed Second Set of Information Requests, totaling just 9 inquiries, is designed to obtain responses from the questions belatedly objected to by the Attorney General (by rewriting them to address his objections), or to follow-up directly on issues raised in the responses. Responses to these questions are material and important and will serve to reduce

administrative and hearing time with unnecessary cross examination of Mr. Effron, the Attorney General's witness.

7. Hearings are scheduled to commence on July 22. If responses are rapidly forthcoming from the Attorney General, this information will assist in narrowing the disputed issues for the Department.

Wherefore, for all the reasons set forth in this Motion, Fitchburg Gas and Electric Light Company respectfully requests that the Department grant FG&E's Motion for Leave to File Nine Additional Information Requests, FGE-2-1 through FGE-2-9.

Respectfully submitted,
FITCHBURG GAS AND ELECTRIC LIGHT COMPANY

By its attorneys,

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